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Attorneys for Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KATHARINE KIRKPATRICK,

Plaintiff,

v.

STATE FARM MUTUAL

AUTOMOBILE

INSURANCE COMPANY and DOES 1-
10 INCLUSIVE,

Defendant.

CASE NO.: 19-cv-03696-RMI

**JOINT STIPULATION TO CONTINUE
CASE MANAGEMENT CONFERENCE**

Date: April 7, 2020

Time: 1:00 p.m.

Courtroom: Federal Court Building

3140 Boeing Avenue

McKinleyville, CA 95519

Judge: Honorable Robert M. Illman.

JOINT STIPULATION TO CONTINUE CMC
19-CV-03696-RMI

SMRH:4847-0270-0217.1

1 **TO THIS HONORABLE COURT, ALL PARTIES, AND THEIR COUNSEL**
2 **OF RECORD:**

3 Plaintiff Katharine Kirkpatrick (“Plaintiff”), and Defendant State Farm Mutual
4 Automobile Insurance Company (“Defendant”) hereby stipulate to continue the Case
5 Management Conference in this action, currently scheduled for April 7, 2020 to July 7,
6 2020 or an available date soon thereafter.

7 **WHEREAS**, Plaintiff filed her Complaint in this matter in the Superior Court of
8 California, County of Humboldt, on April 30, 2019.

9 **WHEREAS**, Defendant filed a Notice of Removal and removed this case to the
10 United States District Court, Northern District of California, on June 25, 2019.

11 **WHEREAS**, the parties appeared for a Case Management Conference on
12 September 24, 2019, and were referred to Magistrate Judge Nathanael Cousins to
13 participate in a settlement conference.

14 **WHEREAS**, the parties appeared before Judge Cousins on November 19, 2019,
15 and a settlement conference was set for January 16, 2020.

16 **WHEREAS**, the parties rescheduled the January 16, 2020 settlement conference to
17 March 5, 2020 to allow additional time for the parties to confirm a date for Plaintiff’s
18 deposition in January 2020.

19 **WHEREAS**, due to unforeseen circumstances, including a sick child and flight
20 cancellations due to severe weather conditions in Eureka, CA (Plaintiff’s location), the
21 parties rescheduled the March 5, 2020 settlement conference to May 7, 2020, which the
22 parties anticipate will be continued in light of COVID-19 Orders.

23 **WHEREAS**, due to the Safer at Home Orders, Plaintiff’s deposition has not yet
24 been taken, and the parties are conferring regarding a potential video deposition via
25 Zoom or other teleconference service in May or June 2020.

1 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**
2 between all parties to this action that the Case Management Conference should be
3 continued to July 9, 2020 or an available date soon thereafter.

4
5 **IT IS SO STIPULATED.**

6
7
8 Respectfully submitted,
9 Sheppard Mullin, Richter, & Hampton, LLP

10 Dated: April 2, 2020

11 By: /s/ Timothy T. Kim
12 TRACEY A. KENNEDY
13 NAMAL TANTULA
14 TIMOTHY T. KIM

15 Attorneys for Defendant State Farm Mutual
16 Automobile Insurance Company

17 FLETCHER LAW OFFICES

18 Dated: April 2, 2020

19 By: /s/Frederic Fletcher
20 FREDERIC FLETCHER
21 Attorney for Plaintiff Katharine Kirkpatrick

22 ** Pursuant to Civ. L.R. 5-1(i)(3), the
23 filer of the document has obtained
24 approval from this signatory.

25 **ORDER**

26 The Case Management Conference previously set for April 7, 2020 is reset to July 7, 2020 at 2:00 p.m.
27 The parties shall appear by phone by dialing 888-684-8852/Access Code 1868782.

28 DATED: 4/6/2020



ROBERT M. ILLMAN
UNITED STATES MAGISTRATE JUDGE